

1 THE HONORABLE DAVID G. ESTUDILLO
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 JERIMIE DIXON,

11 Plaintiff,

12 v.

13 KIZUKI FIFE REAL ESTATE LLC,

14 Defendant.

15 No. 3:22-cv-05713-DGE

16 **STIPULATED MOTION AND
17 ORDER EXTENDING EARLY
18 CASE DEADLINES BY 60 DAYS**

19 Pursuant to Local Civil Rules 7(j) and 10(g), Plaintiff Jerimie Dixon (“Plaintiff”) and
20 Defendant Kizuki Fife Real Estate LLC (“Defendant”) hereby submit this stipulated motion to
21 extend the early case deadlines in this matter by 60 days.

22 WHEREAS, Defendant’s current deadline to move, plead, or otherwise respond to the
23 Complaint is February 7, 2023, and the deadlines for the FRCP 26(f) conference, initial
24 disclosures, joint status report, and initial scheduling conference follow shortly afterward.

25 WHEREAS, good cause exists to extend these deadlines by 60 days because the parties
26 are engaged in productive settlement discussions and the extension may allow them to avoid the
need to expend resources on filings that would be unnecessary if the parties successfully resolve
this dispute.

1 WHEREAS, this stipulated motion is filed in good faith and not for the purposes of
 2 delay.

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among
 4 Defendant and Plaintiff, subject to the Court's approval, the early case deadlines be amended as
 5 follows:

| Deadline | Current Date | Proposed New Date |
|---|---------------------|--------------------------|
| Defendant's deadline to move, plead, or otherwise respond to Plaintiff's Complaint | February 7, 2023 | April 10, 2023 |
| Deadline to Conduct FRCP 26(f) Conference: | March 13, 2023 | May 12, 2023 |
| Deadline to Exchange Initial Disclosures Pursuant to FRCP 26(a)(1): | March 20, 2023 | May 19, 2023 |
| Deadline to File Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): | March 27, 2023 | May 26, 2023 |
| Scheduling Conference | April 4, 2023 | June 3, 2023 |

16 DATED: January 27, 2023

s/ Ian Rogers, WSBA No. 46584

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25 *Attorneys for Plaintiff Jerimie Dixon*

1 **ORDER**

2 **IT IS SO ORDERED**

3 Dated this day of January 30th, 2023.

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7 David G. Estudillo
8 United States District Judge

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11 Presented by:

12 s/ Ian Rogers, WSBA No. 46584

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STIPULATED MOTION AND [PROPOSED] ORDER
TO EXTEND EARLY CASE DEADLINES – 3

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